

74. The provision of UNE OSS is the single most critical barrier to competition as envisioned by the FTA. As I have outlined above and as further explained in the Joint Statement of Steven Turner and Robert Falcone, the availability of and access to UNEs are the bridge to facilities-based competition from Resale. SWBT knows the importance of UNEs also, which explains its refusal to engage in meaningful discussions on UNEs since negotiations began on March 14, 1996 and why it has taken these anti-competitive OSS positions for UNE.

E. As a Result of SWBT's Failure to Provide Nondiscriminatory Access to SWBT's OSSs Via Electronic Interfaces, AT&T has Agreed to Use SWBT's Proprietary Systems on an Interim Basis to Serve Only Residential Resale Customers.

75. As of the date of the filing of this Statement, I would summarize the following relative to the status of the deployment of OSS interfaces:

76. As described previously in this Statement, there are numerous critical developmental issues that have recently been resolved and some that remain unresolved for the Resale ordering and provisioning interfaces. With the system impact, system requirements/specification development, coding development, testing and implementation stages yet to be completed, AT&T is uncertain as to whether or not the ordering and provisioning interfaces will be available on June 1, 1997, as ordered by the Texas Commission and uncertainty also exists with respect to the volume capacity this interface will be capable of supporting.

77. Pre-ordering, ordering and provisioning is the most critical interface required to provide service to customers. It enables the CLEC to complete and transmit a service order for SWBT using the CLECs own internal systems, obtain an order receipt, return of acknowledgments

of orders, edit for valid information, return of error information, order confirmation, return of service order completion status, and other vital steps. With the critical issues that remain outstanding and the numerous issues not negotiated to resolution until very recently, AT&T declared that implementation of the ordering and provisioning interface by June 1, 1997, to be *in jeopardy*.⁸ See letter dated February 14, 1997, from Rian Wren to Stephen Carter (Exhibit ND-6).

78. The OSS interfaces required to support UNE are in the early stages of negotiations and with numerous policy issues remaining unresolved. These policy issues will certainly impact the implementation decisions and timeliness associated with the OSS interfaces required for UNE.

79. AT&T must be in a position to begin to offer local service and take the initial steps towards creating a competitive environment as opposed to allowing SWBT to continue to hold AT&T's marketing entry hostage and prevent it from meeting its business plan objectives. To that end, AT&T has made a decision to pursue dual entry paths and use SWBT's internal proprietary systems, EASE for pre-ordering, ordering and provisioning and CNA for repair and maintenance, to provide Resold service to its residential customers. AT&T has made this decision to ensure earliest market entry despite the inherent limitations of SWBT's proprietary systems and the additional expense and capital requirements of such a decision. AT&T will aggressively work with SWBT to implement the interfaces the parties have agreed to as described in Paragraph 54 to ensure

⁸ The jeopardy situation for ordering and provisioning is shown in Exhibit ND-2 in red. One can see that the EDI jeopardy is a critical and vital component of the OSS implementation.

that AT&T's residential market entry will address all levels of functionality with the appropriate capacity.

80. CNA is used by SWBT's business division customers for reporting troubles and obtaining status on reported troubles. As is the case with EASE, AT&T has made the decision to use SWBT's CNA system on an interim basis pending the implementation of the EBI interface between the entities for repair and maintenance.

81. Although SWBT had been advocating its proprietary systems as opposed to the agreed to interfaces required to provide nondiscriminatory access to SWBT's OSSs, it seems that after AT&T made this decision to use EASE, and CNA on an interim basis, SWBT began to introduce additional costs as a way to introduce additional delays. AT&T had ordered provisioning of a T1.5 circuit for use in testing EASE as well as performing the testing of DataGate for pre-ordering. The circuit activation was also delayed after AT&T's formal decision to use EASE was communicated to SWBT.

82. SWBT halted the activation of the circuit until AT&T agreed to not only SWBT's EASE prices, but for the first time introduced overall prices for access to all OSSs. Via letter, SWBT informed AT&T that "before connectivity is established, we need to obtain AT&T's agreement and acceptance of SWBT's position regarding the rates that will apply to AT&T's requested connectivity to EASE, as well as other OSS functions" Letter dated February 10, 1997 from Alfred Todd, Jr. to Greg Terry (Exhibit ND-7). This action took place *the day before* the circuit was scheduled to be activated and it basically held the connection to test the EASE

circuit "hostage" and required AT&T not only to agree to SWBT's position and prices for EASE, but also to a rate structure for all of SWBT's operation support systems. SWBT "apologized" for the timing, but deemed it necessary for functional availability.

83. SWBT's February 10, 1997 notification was the *first* indication of any price issues with using EASE for Resale and, as can be seen from the letter, was not supported by cost studies or explanations as to methodologies for calculations. To assure AT&T's ability to test the connectivity to EASE, AT&T promptly agreed to the prices under protest to continue the process for final installation of the T1.5 circuit for connectivity to EASE via a letter to Alfred Todd, Jr. dated February 11, 1997 from Surendra Saboo. (Exhibit ND-8). The circuit is now operational and AT&T is in the process of testing the operational functionality of SWBT's EASE interfaces for pre-ordering, ordering and provisioning. This bears scrutiny by this Commission and raises a perfect example of the monopolistic hold that SWBT wields for operation supports systems.

84. EASE does not qualify as an electronic interface as required by the FCC Order. EASE will be used on an interim basis only due to the fact that there have been so many problems resolving the EDI implementation issues. AT&T's agreement is a fall back and safeguard but does not provide the level of functionality to serve all customer segments. Moreover, it does not provide a complete electronic interface even where it can be used.

85. SWBT's consumer EASE (C-EASE) System is inherently an inferior substitute for the EDI interface. There are significant shortcomings that, if used for very long, will place

AT&T and any other CLECs at a significant competitive disadvantage. I will describe the most significant problems with C-EASE in the following paragraphs.

86. *First*, AT&T's use of EASE on an interim basis does not afford comparable interfaces to those used by SWBT retail customer service representatives when servicing the needs of SWBT customers. As can be seen from the graphic illustration in Exhibit ND-9, because EASE is a proprietary SWBT system, it is not interconnected to the downstream systems of AT&T as it is within SWBT. For example, as an order is processed through EASE in SWBT, the information pertinent to the customer account is distributed automatically to the appropriate SWBT downstream customer account and billing systems required for billing and servicing customers. In addition, SWBT, like AT&T, has implemented an architecture whereby its customer service representatives use one process, set of system, terminals and screens across its company to service customers. In comparison, the AT&T customer service representative will be required to:

- process some transactions through C-EASE, others through SORD (*i.e.*, supplemental orders) and yet others manually (*i.e.*, partial migrations); and
- perform dual entry of customer order information into EASE and AT&T's own ordering system, so that AT&T's customer account information can be stored and fed downstream to billing systems. This increases the time to complete an order thus increasing AT&T's sales execution time frames and costs (development is required to implement a split-screen for the AT&T customer service representatives).

87. *Second*, using C-EASE, AT&T will experience the following additional shortcomings and constraints:

- Development of complex Methods and Procedures (M&Ps) for the use of dual systems by AT&T's customer service representatives; and
- EASE is not capable of supporting UNEs.

88. *Third*, as a result of the limitations constraints and duplicate/customized work efforts described in Paragraphs 86 and 87 above, *e.g.*, limitations in service offerings, use of numerous systems, manual processing, redundancy of work steps, and increased error risks, C-EASE *does not* meet the requirements of Section 271 because it does not provide nondiscriminatory access to OCCs.⁹

89. SWBT's Business EASE (B-EASE) is even more deficient than C-EASE to the point that it does not provide AT&T with an interim solution to address the Business Market segments.

90. In addition to the shortcomings and constraints described for C-EASE, B-EASE has the following shortcomings:

- the B-EASE platform is based on an OS-2 operating system and will require the CLEC to use two terminals, as opposed to the split screen capability for residence;
- B-EASE is limited to Business POTS with less than 30 lines;
- B-EASE does not support complex business services, *e.g.*, PBX/DID trunks, ISDN, and Centrex; and
- B-EASE does not support complex order and requires a manual interface; and

⁹ C-EASE fails to provide nondiscriminatory access in terms of data accuracy, timeliness of transactions, availability of information, and tracking mechanisms.

- The lack of the partial migration capability is more detrimental in the business markets where it is more likely that business customers choose multiple carriers (long distance experience).

91. As such, SWBT cannot claim that provision of EASE to CLECs provides parity with its own operation support systems.

92. With respect to the processing of large business orders, SWBT will likely contend that because it handles the complex business orders manually, that manual processing for CLECs is at least parity. I do *not* agree. In this scenario, there is additional manual processing and delay introduced as a result of two service representatives (AT&T and SWBT) being required to write, input, fax, and re-input the order. Multiple personnel and multiple manual entries are not inherent in the SWBT environment.

93. Today, AT&T is not aware of any CLEC using electronic interfaces for pre-ordering, ordering, and provisioning. AT&T is not surprised at this state of affairs, given the confrontation and delay tactics imposed by SWBT for implementation of OSS interfaces. Indeed, the Commission should look long and hard at the reasons that SWBT has failed to implement and commercially provision electronic interfaces.

V. NONDISCRIMINATORY ACCESS TO OPERATIONS SUPPORT SYSTEMS

94. Even if SWBT's proposed OSS interfaces were in a condition of operational readiness, that would not establish that SWBT was actually providing AT&T and other CLECs with nondiscriminatory access to its operations support systems. SWBT must show more than that

it is providing the CLECs with access to its operations supports systems; it must show that the access being provided is nondiscriminatory.

95. To make this showing of nondiscriminatory access, the access provided by SWBT must be monitored to show that SWBT's interfaces actually provide the CLECs with access to its systems with an equivalent level of accuracy, reliability, and timeliness as compared to the access that SWBT provides to its own customer representatives in response to the volumes handled by the CLEC. Unless SWBT submits any performance data for the access to its operations support systems that it has offered to CLECs, SWBT has not established that it is actually providing nondiscriminatory access.

96. To establish that SWBT is providing nondiscriminatory access to its operations support systems, a series of performance measurements, reporting and monitoring mechanisms will be required. Because of SWBT's strategy of delay in connection with OSSs and UNEs, these simply do not exist. These are crucial to a showing that SWBT has complied with the competitive checklist and, as a result, Section 271 relief should be denied until such a showing is made.

VI. NONDISCRIMINATORY ACCESS TO 911, E911, DIRECTORY ASSISTANCE AND OPERATOR CALL COMPLETION SERVICES, AND WHITE PAGES DIRECTORY LISTINGS IS NOT KNOWN AT THIS TIME.

97. To date, AT&T has not seen implementation of SWBT's obligations under Sections 271(c)(2)(B)(vii)(I), (II), and (III) with respect to provision of nondiscriminatory access to 911 and E911 service, directory assistance services, and operator call completion services. In addition, AT&T has not seen any implementation of SWBT's obligations under Section

271(c)(2)(B)(iii) for white page directory listings for CLEC customers. The SGAT is sufficiently vague, so that it is impossible, at this time, to render an opinion on SWBT's compliance. SWBT should be required to provide all steps taken to implement each of these items on the competitive checklist. A mere pledge to implement is not enough.

VII. CONCLUSION

98. As an active participant in the negotiation, development, and finalization of electronic interfaces, I contend that SWBT does not have in place operationally ready interfaces that are or soon will be providing CLECs with nondiscriminatory access to SWBT's operations support systems. SWBT has not yet provided interface specifications that would make it feasible for AT&T or any other CLEC to provide service using the UNE platform. SWBT has not yet provided stable or complete specifications and other necessary related information for either its ordering and provisioning interfaces. The many problems that AT&T has encountered throughout the negotiations process make it fanciful to believe SWBT's claim that the proposed interfaces will be adequate to support competitive entry by CLECs on a large scale. Finally, SWBT will not be able to demonstrate that it is providing CLECs with nondiscriminatory access to all of its operations support systems. Accordingly, SWBT has not fully implemented its obligation to provide CLECs with nondiscriminatory access to its operations support systems.

VERIFICATION

STATE OF TEXAS)

COUNTY OF Dallas)

I, NANCY DALTON, of lawful age, being first duly sworn, now state: that I am authorized to provide the foregoing statement on behalf of AT&T; that I have read the foregoing statement; and the information contained in the foregoing statement is true and correct to the best of my knowledge and belief.

Nancy Dalton
NANCY DALTON
AT&T

SUBSCRIBED AND SWORN TO BEFORE ME this 6th day of March,
1997.

Debbie Crawford
Notary Public

My Commission Expires:

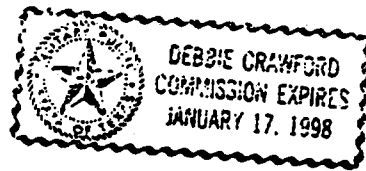
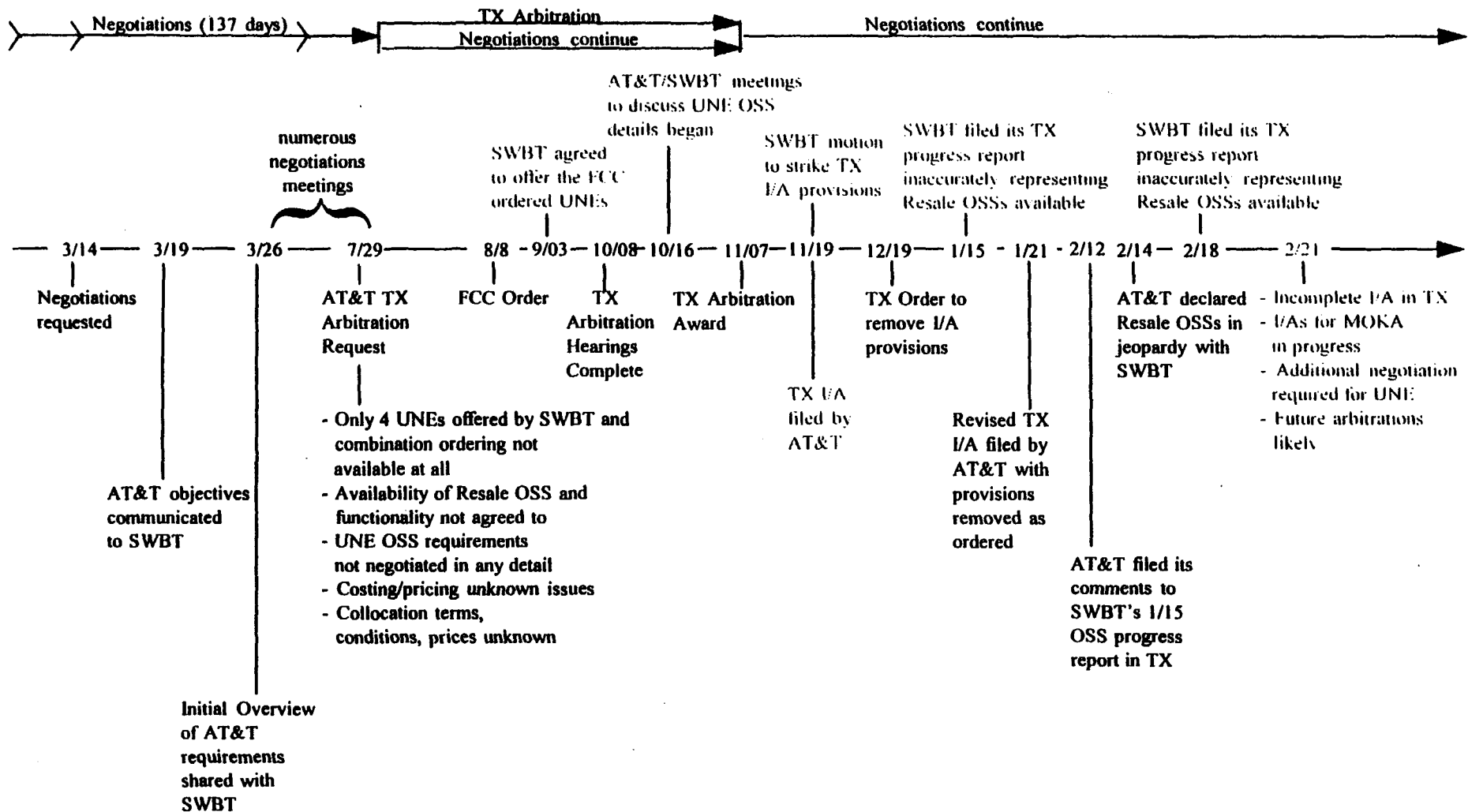


EXHIBIT ND-1
AT&T/SWBT NEGOTIATIONS TIMELINE

AT&T/SWBT Negotiations Timeline

By and large, substantive issues requiring negotiations were ordered by the state commissions – not resolved through negotiations and some remain unresolved resulting in an incomplete Texas Interconnection Agreement.



I/A - Interconnection Agreement

Note: Missouri, Oklahoma, Kansas, and Arkansas arbitration dates not reflected

Exhibit ND-3
9 Pages

EXHIBIT ND-3

**AT&T JANUARY 15, 1997 PROGRESS REPORT
TO TEXAS PUC ON ELECTRONIC INTERFACES**



January 15, 1997

Merric M. Cavanaugh
Attorney

Ms. Paula Mueller
Secretary of the Commission
Public Utility Commission of Texas
1701 N. Congress Avenue
Austin, Texas 78701

Re: Docket Nos. 16189, 16196, 16226, 16285 and 16290

Dear Ms. Mueller:

Enclosed for filing is the original and thirty (30) copies of Southwestern Bell Telephone Company's ("SWBT") January Progress Report for Electronic Interfaces. In filing this report as required by Award paragraph 25, SWBT does not waive any legal arguments that the Arbitration Award and resulting "Agreements" are in whole or in part, unlawful, and SWBT has reserved its right to appeal or seek review of the actions of Texas or federal legislative bodies, courts, or regulatory agencies of competent jurisdiction.

Sincerely,


Merric M. Cavanaugh
Attorney

Enclosures

cc: **Honorable Kathleen Hamilton, ALJ, PUC (hand delivered)**
Bill Magness, Office of Policy Development, PUC (hand delivered)
Vicki Oswalt, Office of Policy Development, PUC (hand delivered)
Carole Vogel, Office of Regulatory Affairs, PUC (hand delivered)
Kevin Zarling, Assistant Director-Legal Division, PUC (hand delivered)
Central Records, PUC (hand delivered)
All Parties of Record (hand delivered)

1616 Constance, Room 600
Austin, Texas 78701-1298

Phone 512 870-5703
Fax 512 870-3420

SOUTHWESTERN BELL'S JANUARY PROGRESS REPORT
FOR ELECTRONIC INTERFACES

Attached are the status reports for the electronic interfaces for Resale and for Unbundled Network Elements.

In filing this report as required by Award Paragraph 25, SWBT does not waive any legal arguments that the Arbitration Award and resulting "Agreements" are, in whole or in part, unlawful, and SWBT reserves its right to appeal or seek review of the actions of Texas or federal legislative bodies, courts, or regulatory agencies of competent jurisdiction.

SWBT'S 1/15 Filing

STATUS REPORT ON ELECTRONIC PRE-ORDER AND ORDERING AND PROVISIONING AVAILABILITY FOR RESALE

FUNCTION (from AT&T Exhibit 15A)	SWBT AVAILABILITY (from AT&T Exhibit 15A)	SWBT STATUS REPORT AS OF JANUARY 15, 1997
		RESALE
PRE-ORDER		
Address Verification	1/1/97	Development of this functionality is complete. SWB internal testing completed. Ready for testing by LSPs.
Service/Features Availability	1/1/97	Development of this functionality is complete. SWB internal testing completed. Ready for testing by LSPs.
Telephone Number Assignment	1/1/97	Development of this functionality is complete. SWB internal testing completed. Ready for testing by LSPs.
Dispatch Schedule	1/1/97	Development of this functionality is complete. SWB internal testing completed. Ready for testing by LSPs.
Due Date	1/1/97	Development of this functionality is complete. SWB internal testing completed. Ready for testing by LSPs.
Customer Service Record (CSR)	1/1/97C	This functionality is in development with internal testing scheduled for completion prior to 3-1-97.
POTS ORDERING & PROVISIONING		
Migration (Convert Customer As Is)	1/1/97	Development of this functionality is complete. SWB internal testing completed. Ready for testing by LSPs. Recap of end-user's S&B to be supplied by LSP.
Migration With Changes (Convert with changes)	1/1/97	Development of this functionality is complete. SWB internal testing completed. Ready for testing by LSPs. Recap of end-user's S&B to be supplied by LSP.

- Add/Disc Class Features	1/1/97	Development of this functionality is complete. SWB internal testing completed. Ready for testing by LSPs. Supports all feature codes currently agreed to with AT&T.
- Add/Disc Blocking (1+, 0+, 011)	1/1/97	Development of this functionality is complete. SWB internal testing completed. Ready for testing by LSPs.
- PIC and PIC Freeze	1/1/97	Development of this functionality is complete. SWB internal testing completed. Ready for testing by LSPs.
- Add/Disc Essential Lines	1/1/97	Development of this functionality is complete. SWB internal testing completed. Ready for testing by LSPs.
- Add/Disc Additional Lines	1/1/97C	Development of this functionality is complete. SWB internal testing completed. Ready for testing by LSPs.
- Directory Listing Changes	2/1/97C	EDI mapping requirements for straight-line directory listings received from AT&T on 1-13-97.
Partial Migration (Line/WTN vs. Account Level)	4/1/97- 7/1/97T	Pending definition of business scenarios and subsequent changes necessary to accommodate those scenarios. Joint meeting is scheduled for Jan 17 to discuss.
New connects		
- Single Line	2/1/97C	Pending development and testing of directory listing logic based on EDI mapping requirements received from AT&T on 1-13-97.
- Multi-Line (Less Than 30 Lines)	2/1/97C	Pending development and testing of directory listing logic based on EDI mapping requirements received from AT&T on 1-13-97.
- Projects (Large Job - add'l facilities/coordinated work effort required - need SWBT criteria)	7/1/97T	Pre-order information must be requested prior to sending a firm order via EDI. Pending definition of business scenarios and subsequent changes to accommodate those scenarios.
Disconnects	1/1/97	Development of this functionality is complete. SWB internal testing completed. Ready for testing by LSPs.

Change Orders		
- Add/Disc Class Features	3/1-4/1/97C	Pending definition of business scenarios and subsequent changes necessary to accommodate those scenarios. EDI mapping must be completed.
- Simple Number Change	3/1/97C	Pending definition of business scenarios and subsequent changes necessary to accommodate those scenarios. EDI mapping must be completed.
- Add/Disc Blocking	3/1-4/1/97C	Pending definition of business scenarios and subsequent changes necessary to accommodate those scenarios. EDI mapping must be completed.
- PIC and Local PIC Change	4/1/97C	Pending definition of business scenarios and subsequent changes necessary to accommodate those scenarios. EDI mapping must be completed.
- Add/Disc Essential Lines	3/1-4/1/97C	Pending definition of business scenarios and subsequent changes necessary to accommodate those scenarios. EDI mapping must be completed.
- Add/Disc Additional Changes	3/1-4/1/97C	Pending definition of business scenarios and subsequent changes necessary to accommodate those scenarios. EDI mapping must be completed.
- Directory Listing Changes	4/1/97C	Pending definition of business scenarios and subsequent changes necessary to accommodate those scenarios. EDI mapping must be completed.
- Suspend/Restore Non-Payment	1/1/97	Development of this functionality is complete. SWB internal testing completed. Ready for testing by LSPs.
- Suspend/Restore Vacation Svc.	1/1/97	Development of this functionality is complete. SWB internal testing completed. Ready for testing by LSPs.
Records Only Order	4/1/97C	Will complete at same time as change orders.
T&F Order	4/1/97C	Pending definition of business scenarios and subsequent changes to accommodate those scenarios.

NON-POTS SERVICE ORDERS		For each order type below, except for Semi-Public Phones, SWBT continues to be concerned about the difficulties of establishing an electronic interface which would support all the numerous codes required for these unique and extremely complex order types. Because each order is unique to a particular customer, SWBT inputs these orders manually by specially trained service order writers.
PBX Trunks	6/1/97T	Pending definition of business scenarios and subsequent changes to accommodate those scenarios.
DID Trunks	6/1/97T	Pending definition of business scenarios and subsequent changes to accommodate those scenarios.
Plexar	7/1/97T	Pending definition of business scenarios and subsequent changes to accommodate those scenarios.
Digiline/ISDN	7/1/97T	Pending definition of business scenarios and subsequent changes to accommodate those scenarios.
Semi-Public Phones	1/1/97C	AT&T has agreed to obtain the additional feature codes needed for this service.
MegaLink (T1.5)	7/1/97T	Pending definition of business scenarios and subsequent changes to accommodate those scenarios.
OTHER - SERVICE ORDER COMPONENTS		
Multi-Line Hunting	4/1/97C	Pending definition of business scenarios and subsequent changes to accommodate those scenarios.
Preferential Hunting	3/1/97C	Pending definition of business scenarios and subsequent changes to accommodate those scenarios.
Transfer of Calls - Network Intercept	1/1/97	Development of TFC associated with D ord functionality is complete. SWB internal testing completed. Ready for testing by LSPs. TFC associated with C ord - date C order flows are implemented. TFC associated with T&F - date T&F order flows are implemented.

Toll Billing Exception (alternatively billed calls)	1/1/97	Development of this functionality is complete. SWB internal testing completed. Ready for testing by LSPs.
Handicap Services	1/1/97	Handicap services on C orders and N orders will be effective when those order types are implemented.
ComCall	4/1/97C	Pending definition of business scenarios and subsequent changes to accommodate those scenarios.
Future Expected Delivery Date (EDD)	4/1/97C	
Conversion When Final Bill Address Is Foreign PO	4/1/97C	
DIRECTORY LISTINGS		
Directory Listing (Straight Line)		
- White	2/1/97C	Pending development and testing of directory listing logic based on EDI mapping requirements received from AT&T on 1-13-97.
- Yellow	N/A	
Directory Listing Other Than Straight Line		
- White	2/1/97C	EDI mapping must be completed.
- Yellow	N/A	
Directory Order Changes Prior to Publishing		
- White	N/A	
- Yellow	N/A	

Directory White Pages (Non-SWBT Areas)	N/A	
Directory Expedite		
- White	N/A	
- Yellow	N/A	
POST SERVICE ORDER EDI TRANSACTIONS		
Supplemental Orders		
Firm Order Confirmation (FOC)	4/1/97C	Development of this functionality is complete. SWB internal testing completed. Ready for testing by LSPs.
Jeopardies	?	SWBT does not have "jeopardy" reporting capabilities for it's own service orders. However, development of a Past Due Report is underway for 4-1-97 availability.
Rejects	1/1/97	Development of this functionality is complete. SWB internal testing completed. Ready for testing by LSPs.
Order Completion	1/1/97	Development of this functionality is complete. SWB internal testing completed. Ready for testing by LSPs.

Status Report on Electronic Interfaces for Unbundled Network Elements**Pre-Order:**

Address Verification	1/1/97	Development of this functionality is complete. SWB internal testing completed. Ready for testing by LSPs.
Service/Features Availability	1/1/97	Development of this functionality is complete. SWB internal testing completed. Ready for testing by LSPs.
Telephone Number Assignment	1/1/97	Development of this functionality is complete. SWB internal testing completed. Ready for testing by LSPs.
Customer Service Record (CSR)	1/1/97C	This functionality is in development with internal testing scheduled for completion prior to 3-1-97.

Note: The above preorder capabilities are the same for UNE as for Resale.

Ordering:

SWBT has developed an EDI electronic interface to receive Local Service Requests for Unbundled Network Elements (UNE). This interface also electronically responds to the LSP with acknowledgements (including error conditions if applicable), Firm Order Confirmations and Service Order Completion notices. Effective 1/2/97, SWBT is ready for LSP testing of this interface. SWBT's UNE EDI Interface is based on OBF/EDI national standards current with OBF definitions in final closure as of 1/2/97. This interface currently supports the ordering of Local Loop, Local Loop with Interim Number Portability, Interim Number Portability and Switch Ports for the following activity types: new connect, change, disconnect, inside move, outside move, records change and conversion to new LSP.

Exhibit ND-4
12 Pages

EXHIBIT ND-4

**AT&T FEBRUARY 12, 1997 RESPONSE TO
SWBT JANUARY PROGRESS REPORT TO
TEXAS PUC ON ELECTRONIC INTERFACES**



Thomas C. Pefts
Chief Regulatory Counsel

February 12, 1997

Suite 1500
919 Congress Avenue
Austin, Texas 78701-2444
512 370-2010
FAX: 512 370-2096

Ms. Paula Mueller
Secretary of the Commission
Public Utility Commission of Texas
1701 N. Congress Avenue
Austin, TX 78701

Re: Docket No. 16226 - Status of Electronic Interfaces

Dear Ms. Mueller:

AT&T has reviewed the SWBT January 15, 1997, progress report regarding electronic interfaces for total services resale and compared SWBT's report to the current state of the detailed implementation negotiations currently in progress between AT&T and SWBT. We wish SWBT's report accurately reflected the status, but there are numerous areas where the reported progress is substantially exaggerated.

In its status report, SWBT indicated that in several areas it has completed development and these areas provide functions that are available for LSPs to test. Although this may be the case for five of the six pre-ordering functions and a very limited number of ordering/provisioning functions, the vast majority of the ordering/provisioning functions and order types remain unresolved from a requirements definition perspective. The ordering and provisioning area is where AT&T and SWBT have significant differences of opinion with respect to the availability of the required functionality and order types for both Resale and Unbundled Elements. From a timeline perspective it is important to note that the following dates have been agreed to between AT&T and SWBT for issue closure:

1. AT&T and SWBT are currently working to resolve implementation issues for business POTS services. These implementation issues were scheduled to be resolved by February 7, 1997. The issues that were still outstanding as of February 7, 1997, were escalated to the AT&T and SWBT executive leadership teams and closure of these issues has been deferred until end-of-business today.
2. AT&T and SWBT have agreed to resolve the unresolved implementation issues associated with the consumer interfaces not later than February 21, 1997.
3. AT&T and SWBT have agreed to resolve the unresolved implementation issues associated with complex business (PBX/DDI trunks) services by February 28, 1997.

Ms. Paula Mueller
February 12, 1997
Page 2

Resolution of the unresolved issues from a requirements perspective is but the first step in the process, one which must be resolved before development and testing can begin. It is not until the technical teams from both AT&T and SWBT have reached agreement on requirements that the systems development teams from each Company can determine how to code and develop the systems modifications necessary to implement the requirements. With requirements definition not scheduled to be completed for POTS and DID/PBX services until February 28, 1997, SWBT's reported status of "development complete" for numerous ordering/provisioning functions/order types is simply inaccurate. When developing interfaces between and among systems and Companies, it is critical that requirements be mutually agreed upon in order for the interface to be functional when deployed; a unilateral approach to systems requirements definition and development will not result in an "interface" that will be functional between two Companies.

A side-by-side analysis of AT&T's status as of SWBT's January 15, 1997, progress report as of this date is attached. While not included herein, AT&T and SWBT are tracking a list of unresolved issues worked by the technical teams. The list of disputed issues reflect the detailed issues that require resolution in order to resolve the higher level ordering/provisioning functionality and order type issues that are unresolved at this time.

In summary, there is still considerable work to be completed between the Parties to implement the electronic interfaces for Resale. Progress in the area of Resale is being made, but the going has been slow as the Parties work together to resolve the open issues.¹ In contrast, the Parties are at the very early stages of implementation discussions with respect to defining the requirements necessary for UNE electronic operational interfaces.

AT&T will present a person with knowledge of the status of the discussions and who is ready to answer any questions relating to this response, SWBT's January 15th status report, as well as the then current status of all ordering, provisioning and support systems issues for both Resale and Unbundled Elements, at the "status report" session scheduled for February 28, 1997.

Sincerely,



Thomas C. Pelt
Chief Regulatory Counsel

cc: Ms. Kathleen Hamilton, Administrative Law Judge, PUC
Ms. Carol Vogel, Director, Office of Regulatory Affairs, PUC
Ms. Vicki Oswalt, Director, Office of Policy Development, PUC
Mr. Bill Magness, Chief Counsel, Office of Policy Development, PUC
All Parties of Record to Consolidated Arbitration Proceedings

Attachment

¹ In fact, because of the jeopardies around joint testing of EDI interfaces, AT&T is currently reevaluating SWBT's proprietary "EASE" system to support its initial resale entry, at least for residential and non-complex business orders.